

FILED
IN THE UNITED STATES DISTRICT COURT
U.S. DISTRICT COURT, N.Y.
DEC 28 2018
BROOKLYN OFFICE

BROWN GAVALAS & FROMM LLP
Attorneys for Movant
AMERICAN STEAMSHIP OWNERS
MUTUAL PROTECTION AND
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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In Re: Motion to Quash Subpoena issued to
American Steamship Owners Mutual
Protection and Indemnity Association, Inc.
dated December 17, 2018.

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MISC 18 - 3457
No.: 18-mc-__

MATSUMOTO, J.

**NOTICE OF MOTION TO
QUASH SUBPOENA DUCES TECUM**

PLEASE TAKE NOTICE, that upon the accompanying Declaration of Donald R. Moore dated December 26, 2018, the Declaration of David H. Fromm, Esq. dated December 27, 2018, the exhibits annexed thereto, and the Memorandum of Law, the Movant, AMERICAN STEAMSHIP OWNERS MUTUAL PROTECTION AND INDEMNITY ASSOCIATION, INC., by and through their attorneys, BROWN GAVALAS & FROMM LLP, will move this Court at the United States District Court for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York 11201, on the 11th day of January, 2019 at 10:00 a.m., or as soon thereafter as the business of the Court allows, for an Order pursuant to Rule 45(d) of the Federal Rules of Civil Procedure, quashing the subpoena *duces tecum* served by Pacific Gulf Shipping Co. on the grounds that the subpoena was not authorized by the United States District Court for the District of Oregon in the Supplemental Admiralty Rule B Attachment proceeding

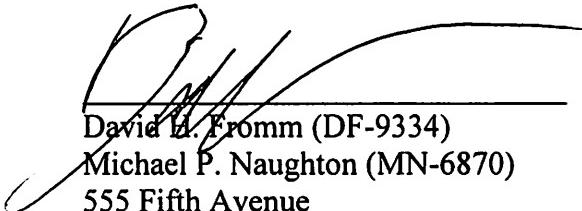
from which it was issued, is unduly burdensome, is impermissibly overbroad, fails to allow a reasonable time to comply, and seeks privileged and confidential documents and communications. The Movant also seeks such further and different relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that the Movant reserve the right to file and serve reply papers if necessary.

Dated: New York, New York
December 28, 2018

Respectfully submitted,

BROWN GAVALAS & FROMM LLP
Attorneys for Movant
AMERICAN STEAMSHIP OWNERS
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